

LIPSON NEILSON P.C.  
JOSEPH P. GARIN, ESQ.  
Nevada Bar No. 6653  
9900 Covington Cross Drive, Suite 120  
Las Vegas, Nevada 89144  
Phone: (702) 382-1500  
Fax: (702) 382-1512  
[jgarin@lipsonneilson.com](mailto:jgarin@lipsonneilson.com)

*Attorneys for Defendant*

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

<p>Maria Cardenas and Susie Frazier-Telles, individually and on behalf of all others similarly situated,</p> <p style="text-align: center;">Plaintiffs,</p> <p style="text-align: center;">vs.</p> <p>Super Care, Inc., dba SuperCare Health,</p> <p style="text-align: center;">Defendant.</p>	<p>) Case No: 2:22-cv-00590-APG-NK ) ) ) <b>STIPULATION AND ORDER TO</b> ) <b>TRANSFER CASE TO CENTRAL</b> ) <b>DISTRICT COURT OF CALIFORNIA</b> ) <b>WHERE RELATED CASES ARE</b> ) <b>PENDING</b> ) ) )</p>
---	--

Plaintiffs Maria Cardenas and Susie Frazier-Telles ("Plaintiffs") and Defendant Super Case, Inc., dba SuperCare Health ("Defendant"), by and through their respective attorneys of record, hereby jointly submit this Stipulation to request the Court to transfer this action to the United States District Court for the Central District of California.

There are several cases pending in the Central District of California before the Hon. Judge Dale S. Fischer against the same Defendant and arising out of the same incidents alleged in the Complaint. See, docket reports for the following cases: *Hamid Shalviri v. Super Care, Inc.*, Case No. 2:22-cv-02585-DSF-AGR; *Anthony Henson v. Super Care, Inc.*, Case No. 2:22-cv-02820-DSF-AGR; *Charles Stephanski v. Super Care, Inc.*, Case No. 2:22-cv-03248-DSF-AGR; and *Harmon Cottrell v. Super Care, Inc.*, Case No. 5:22-cv-00835-DSF-AGR, copies of which are attached hereto as **Exhibit A**.

Section 1404 of Title 28 of the United States Code provides: "For the convenience of the parties, in the interest of justice, a district court may transfer any civil action to any

**LIPSON NEILSON P.C.**  
 9900 Covington Cross Drive, Suite 120, Las Vegas, Nevada 89144  
 Telephone: (702) 382-1500 Facsimile: (702) 382-1512

other district or division where it might have been brought or to any district or division to which all parties have consented.” The transfer of this action to the Central District of California to be litigated in conjunction with the other cases pending against Defendant thereat will serve the interests of justice and judicial efficiency, especially since all of the cases are designated as Class Action Complaints.

In light of the foregoing, the herein Parties request that the Court transfer this action to the United States District Court for the Central District of California so that Plaintiffs may file a consolidated complaint with the actions pending before Judge Fischer, or to file more appropriate pleadings in relation to this class action lawsuit against the herein common Defendant.

Dated this 15<sup>th</sup> day of June, 2022.

FREEDOM LAW FIRM

*/s/ Gerardo Avalos*

George Haines, Esq.  
 Gerardo Avalos, Esq.  
 8985 S. Eastern Ave., Suite 350  
 Las Vegas, NV 89123  
[info@freedomlegalteam.com](mailto:info@freedomlegalteam.com)

Michael Kind, Esq.  
 KIND LAW  
 8860 S. Maryland Pkwy, Suite 106  
 Las Vegas, NV 89123  
[mk@kindlaw.com](mailto:mk@kindlaw.com)

*Attorneys for Plaintiffs*

Dated this 15<sup>th</sup> day of June, 2022.


LIPSON NEILSON P.C.

*/s/ Joseph P. Garin*

JOSEPH P. GARIN, ESQ.  
 Nevada Bar No. 6653  
 9900 Covington Cross Drive, Suite 120  
 Las Vegas, Nevada 89144  
 (702) 382-1500

*Attorneys for Defendant*

**IT IS SO ORDERED.**

  
 U.S. DISTRICT COURT JUDGE  
 DATED: June 16, 2022